



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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March 3, 2000

Ron Ryan  
SF Phosphates Limited Company  
9401 North Highway 91  
Vernal, Utah 84087-7802

Re: Review of Tailings Test Plot Study, SF Phosphates Limited Company (SF), Vernal Phosphate Operations, M/047/007 (UTU-76097), Uintah County, Utah

Dear Mr. Ryan:

The Division has completed a review of the December 9, 1999 test plot study for the SF Phosphates tailings storage facility. After reviewing this information, the Division has the following comments which will need to be addressed before approval of the test plot study may be granted. Please provide a response to these comments by April 1, 2000.

1. The study proposal does not identify the use of topsoil over the tailings. Will topsoil be used? If so, what is the proposed depth of topsoil? If no topsoil will be used, it is recommended that a minimum of 15 ton/acre of composted manure or biosolids be applied to a portion of the test plot. Experience has shown that this treatment (amendment) has significantly increased revegetation success when used on raw materials such as tailings or fines.
2. The proposed study design does not include a rate of application for the hay mulch amendment. Please provide the rate (tons/acre equivalent) that will be used on the test plots.
3. The seeding rate for seedmix #1 is considered excessive and may contribute to lower vegetation success because of competition. It is suggested that the seeding rate for seedmix #1 be reduced by  $\frac{1}{2}$ .
4. The seeding rate for seedmix #2 is also considered excessive and may contribute to lower vegetation success because of competition. It is suggested that the seeding rate for seedmix #2 be reduced by  $\frac{1}{3}$ .

If you have any questions in this regard please contact me, Tony Gallegos, or Lynn Kunzler, of the Minerals Staff. If you wish to arrange a meeting to discuss this review, please contact us at your earliest convenience. Thank you for your cooperation.

Sincerely,

D. Wayne Hedberg  
Permit Supervisor  
Minerals Regulatory Program

jb  
cc: Pete Sokolosky, BLM Vernal FO  
m47-07 testplot.rvw